

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Implementation of the NET 911)	
Improvement Act of 2008)	WC Docket No. 08-171
)	

COMMENTS OF VIXXI

Vixxi Solutions, Inc. (“Vixxi”) writes to second the comments of several others in the captioned proceeding. Vixxi offers Virtual Positioning Center (“VPC”) services to VoIP service providers (“VSPs”), cable operators, and cellular companies.¹

These include service order processing, ALI updates, MSAG management,² geo-spatial lookup, call routing, and provision to the PSAP of precise location and emergency service information. In addition, VIXXI’s patented hardware solutions provide a comprehensive VoIP answer for both the small and large PSAP. VIXXI’s Network Operating Center (“NOC”) in Richardson, Texas, and its mirrored, geographically diverse hot-standby facilities in Aurora, Colorado operate every day to serve a broad spectrum of the industry.

As a VPC service provider, Vixxi agrees with TCS (Comments,8) that “the ability of VPCs to acquire ESQKs and to pool them on behalf of multiple VSPs is critical.” This is also the implication in the Comments of Intrado (at 10-11)

¹ <http://www.vixxisolutions.com/>

² ALI stands for automatic location information, MSAG for Master Street Address Guide.

Like TCS, Vixxi has filed a request for waiver to permit its direct acquisition of telephone-like numbers that can be used as ESQKs.³ However, the preferable course would be to grant this access as a consequence of capabilities we believe Congress intended VSPs to have, through their serving VPCs.

Respectfully submitted,

VIXXI SOLUTIONS, INC.

By _____

James R. Hobson
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036-4320
(202) 785-0600

September 17, 2008

ITS ATTORNEY

³ Docket 99-200, posted September 9, 2008.